

United States Courts  
Southern District of Texas  
FILED  
Appendix A  
MAR 23 2020

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
DIVISION

David J. Bradley, Clerk of Court

SUNIL D. CHORGHE

versus

HOUSTON DEPT OF TRANSPORTATION  
7600 WASHINGTON AVE  
HOUSTON, TX 77007

§  
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§

CIVIL ACTION NO. \_\_\_\_\_

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

SUNIL D. CHORGHE

Address:

5454 NEWCASTLE DR.  
UNIT #221, HOUSTON TX 77081.

County of Residence:

HARRIS

3. The defendant is:

HOUSTON DEPARTMENT OF TRANSPORTATION  
7600 WASHINGTON AVE (HOU-DOT)  
HOUSTON, TX 77007 ENGG-DEPT

☐

Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on \_\_\_\_\_

with the Equal Opportunity Commission.

5. On the date of 12/26/2019 (date mailed)  
MIDTAN, 2020, the plaintiff received a Notice of Right to Sue

letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☒ race
- (b) ☒ color
- (c) ☒ sex
- (d) ☒ religion
- (e) ☒ national origin,

the defendant has:

- (a) ☒ failed to employ the plaintiff
- (b) ☒ terminated the plaintiff's employment
- (c) ☒ failed to promote the plaintiff
- (d) ☐ other: FAILED TO RETURN PERSONAL BELONGINGS, ETC.

AND

POST EMPLOYMENT DOCUMENTS, LEAVES ETC.

7. When and how the defendant has discriminated against the plaintiff:

STARTED EMPLOYMENT AT TXDOT-BEAUDONT 10/01/2016 AS ENGR II  
FROM LATE 2016, HOU-DOT (HOUSTON) STARTED DISCRIMINATING  
AFTER PROMOTING ME TO ENGR III. TERMINATED MY EMPLOYMENT  
WITH IN FEW HOURS OF COMPLAINING TO TXDOT CIVIL RIGHTS  
DIVISION. ON FEB 25, 2019. ON DEC 10, 2019 TWC AWARDED ME -  
- UNEMPLOYMENT AFTER SEVERAL MONTHS OF HEARINGS.

8. The plaintiff requests that the defendant be ordered:

- (a) ☒ to stop discriminating against the plaintiff
- (b) ☒ to employ the plaintiff
- (c) ☒ to re-employ the plaintiff
- (d) ☒ to promote the plaintiff

- (e) ☒ to RETURN <sup>my</sup> BELONGINGS, LIST AND POSTAGE TO  
SENT BACK TO HOV-DOT, STATE'S BELONGINGS  
WHICH WAS SENT TO ME., TO REMOVE  
ALL DISCIPLINARIES FROM HR FILE. and that;
- (f) ☒ the Court grant other relief, including injunctions, damages, costs and attorney's fees.



(Signature of Plaintiff)

Address: 5454 NEWCASTLE DR.  
UNIT # 221, HOUSTON, TX-77081

Telephone: 956-607 6733